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Attorneys for Plaintiff
WORLD FUEL SERVICES (SINGAPORE) PTE
LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

WORLD FUEL SERVICES
(SINGAPORE) PTE LTD.,

Plaintiff,

ZHONG XIN PEARL M/V, IMO Number
9684134, *in rem*,

Defendant.

IN ADMIRALTY

Case No. 3:20-cv-07423-JCS

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE

Pursuant to this Court's Order to Show Cause, Dkt. No. 8, Plaintiff responds as follows:

Plaintiff thanks the Court for its Order to Show Cause noting the absence of Mr. Toney's Declaration from the Court's docket.

1. The Declaration of Robert Toney has now been filed as Dkt. No. 9.
2. As to the Court's authority to enter an order allowing cargo handling operations to continue and for movement of the vessel, the court has inherent authority to control proceedings before the Court, including the authority to control the holding and disposition of any res held by the Court, and its equitable powers to ameliorate any harm caused by the judicially authorized prejudgment attachment of property. If the event the Court disagrees, Plaintiff withdraws its Motion for Order Allowing Cargo Handling and Movement of Vessel, and is submitting to the

1 Court a revised form of Warrant of Arrest without references to any Order Allowing Cargo
2 Handling and Vessel Movement.

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4 Dated: October 23, 2020

MILLER NASH GRAHAM & DUNN LLP

5 By: /s/ Phillip Allan Trajan Perez
6 Phillip Allan Trajan Perez
7 Tyler D. Bowlin
8 Attorneys for Plaintiff
WORLD FUEL SERVICES
(SINGAPORE) PTE LTD.

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